

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>3:21-CR-103</b>
	:	
<b>v.</b>	:	<b>(Judge Mariani)</b>
	:	
<b>JASON CHARLES LAJOIE</b>	:	<b>(Electronically Filed)</b>

**MOTION FOR FURLOUGH TO ATTEND VIEWING**

AND NOW comes the Defendant, Jason Charles LaJoie, by his attorney, Christopher Opiel, CJA appointed counsel, and files the following Motion for Furlough to attend the viewing of Defendant’s step-son in Lincoln, Rhode Island on October 24, 2021. In support thereof, it is averred as follows:

1. On April 6, 2021, the Defendant was charged in an Indictment with eight (8) counts of distribution of methamphetamine in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); one (1) count of possession with intent to distribute methamphetamine in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C); one (1) count of possession of a firearm in furtherance of drug trafficking in violation of 18 U.S.C. § 924(c)(1)(A)(i); and one (1) count of prohibited person in possession of a firearm in violation of 18 U.S.C. § 922(g). (Doc. 1).

2. On May 13, 2021, the Defendant entered a plea of “not guilty” to the Indictment. (Doc. 8).

3. On May 17, 2021, an Order of Detention Pending Trial was entered by Chief Magistrate Judge Karoline Mehalchick. (Doc. 14).
4. Defendant is currently detained at the Lackawanna County Correctional Facility.
5. On October 15, 2021, Defendant's step-son<sup>1</sup>, Christian V. Almanzar, passed away. (Obituary attached as "Exhibit A").
6. The public viewing for Christian V. Almanzar is scheduled for 3:00 PM to 6:00 PM on Sunday, October 24, 2021 at Keefe Funeral Home, 5 Higginson Avenue, Lincoln, Rhode Island 02865.
7. Defendant is respectfully requesting a furlough so that he can have attend a private family viewing from 2:30 PM to 3:00 PM at Keefe Funeral Home, 5 Higginson Avenue, Lincoln, Rhode Island 02865.
8. Keefe Funeral Home is approximately a five (5) hour car ride from the Lackawanna County Correctional Facility.
9. Due to the length of the car ride Undersigned Counsel has included an extra forty-five (45) minutes of travel time (each way) to account for rest stops and/or traffic delays.

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<sup>1</sup> Defendant is not the biological father of Christian; however, Defendant has raised Christian since he was a baby and always considered Christian his son. The Pretrial Services Report prepared by the United States Probation office in preparation of the May 17, 2021 Detention Hearing lists Christian as the son of Defendant.

10. Defendant is specifically requesting that family friend, Brian James Compton (DOB 4/30/1983), pick up Defendant from the Lackawanna County Correctional Facility at 8:45 AM on Sunday, October 24, 2021. Defendant and Mr. Compton would travel directly to Keefe Funeral Home in Lincoln, Rhode Island. Defendant would pay his respects to his step-son from 2:30 PM to 3:00 PM. Immediately thereafter, Mr. Compton would drive Defendant back to the Lackawanna County Correctional Facility and he would arrive by 8:45 PM on Sunday, October 24, 2021.

11. Defendant would be more than willing to wear a GPS monitor during this proposed furlough if the Court prefers and if accommodations are available.

12. Undersigned Counsel has notified AUSA Jenny P. Roberts regarding this furlough request; however, due to the tight time frame Undersigned Counsel was unable to ascertain the Governments position prior to the filing of this motion.

WHEREFORE, the Defendant, Jason Charles LaJoie, respectfully requests that this Honorable Court grant the within motion and allow Defendant to attend the viewing of his son on October 24, 2021, pursuant to the logistics provided for herein.

Respectfully submitted,

Date: October 21, 2021

/s/ Christopher Opiel  
**Christopher Opiel, Esq.**

**CJA Appointed Counsel**

**Attorney ID# PA318776**

Opiel Law

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**CERTIFICATE OF SERVICE**


I, Christopher Opiel, CJA appointed counsel, do hereby certify that this document, the foregoing **Motion for Furlough to Attend Viewing**, filed electronically through the ECF system will be sent to the registered Participants as identified on the Notice of Electronic Filing, including the following:

Jenny P. Roberts, Esquire  
Assistant United States Attorney

Date: October 21, 2021

/s/ Christopher Opiel \_\_\_\_\_  
**Christopher Opiel, Esq.**  
**CJA Appointed Counsel**

# **EXHIBIT A**

 Select Language ▼



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## Christian V. Almanzar | October 15, 2021 | [Share on](#)



Christian V. Almanzar, 32, of Cumberland, R.I., passed away on October 15, 2021. He was the husband of Alexandra Rabbitt. Born in Manhattan, he was a son of Eulalia Echevarria and the late Jose Francisco Almanzar Surinach. Christian served in the U.S. Army.

Besides his wife he is survived by his children, Jayden Rabbitt, Naveah Almanzar, Christian Almanzar Jr.; siblings, Jason Lajoie Jr., Zachary Lajoie, Valentin Almanzar, Crystal Echevarria, Emily Echevarria, Elizabeth Almanzar, Nelsy Almanzar; aunt, Eni Rivera; uncle, Danny Flores.

Relatives and friends are invited to attend visitation on Sunday, October 24th from 3:00 – 6:00pm at Keefe Funeral Home, Five Higginson Ave., Lincoln, R.I. A Mass of Christian Burial will be Monday, October 25th at 9:00am in Holy Spirit Parish, Dexter St., Central Falls, R.I. Burial with Military Honors will follow in Bourne National Veteran Cemetery, Bourne, MA.

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Keefe Funeral Home

5 Higginson Avenue

Lincoln, Rhode Island 02865

 **Telephone 401-725-4253**